rise the light
Qwest.

Qwest
1801 California Street, 49th Floor
Denver, Colorado 80202
Phone 303 672-2860
Facsimile 303 295-7069

James T. Hannon
Senior Attorney

October 9, 2001

Ms. Diane Harmon
Chief, Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W., Rm. 6A-420
Washington, DC 20554

EX PARTE

RE: AT&T's Proposed Revised Transition Plan for the Discontinuance of AT&T Coin Sent-Paid Service
CC Docket No. 96-128, NSD File No. W-P-D-497

Dear Ms. Harmon:

On September 18 and September 25, 2001 AT&T filed *Ex Parte* letters with your office concerning AT&T's proposed revised transition plan to discontinue coin sent-paid service. AT&T submitted a large amount of usage information by central office ("CO") which should be quite helpful to local exchange carriers ("LECs") in evaluating the impact of AT&T's proposed discontinuance. Qwest appreciates AT&T's responsiveness in submitting this information.[1] While AT&T has not provided information by originating Automatic Number Identification ("ANI") (*i.e.*, payphone), the CO level data that they have provided should assist the Commission in determining how the public interest could be affected by AT&T's proposed discontinuance.

Qwest's primary purpose in responding to AT&T's *Ex Partes* is to correct any misunderstanding that AT&T or the Commission may have concerning Qwest's position on its provision of a customized message once AT&T has discontinued coin sent-paid service. AT&T implies that neither Qwest nor other incumbent LECs have significant concerns with deploying a customized message in their COs.[2] AT&T is seriously mistaken with respect to Qwest. Even a cursory reading of Qwest's Comments should have made it crystal clear that providing a customized message in incumbent LEC COs raises significant issues.[3] Qwest estimates that 25% of its switches have no additional message capacity and would not be able to accommodate another message.[4] The cost of adding message capacity in these switches to accommodate an

[1] In commenting on AT&T's earlier proposed transition plan, Qwest pointed out that it was extremely difficult, if not impossible, for either the Commission or Qwest to evaluate the impact of AT&T's proposed discontinuance without more detailed usage information. *See* Qwest Comments, filed Aug. 24, 2001 at 10 ("Qwest Comments").

[2] *See* AT&T Sep. 18 *Ex Parte* at 4. "Where a customized message is necessary, AT&T is willing to pay reasonable charges to implement such an announcement. In AT&T's initial discussions with Bell South, Ameritech, Qwest, Alltel and Sprint, this has not generated any significant issues, ..."

[3] *See* Qwest Comments at 6-10.

[4] *Id.* at 6.

additional customized message is estimated to be $6 million.[5] Furthermore, it is not at all clear that a customized message could be deployed in all Qwest COs in a timely manner.[6] Qwest assumes that its situation is not unique and that other incumbent LECs face similar concerns even though they may have not articulated them publicly.

Aside from implementation issues, the question of who should bear the costs remains open. Qwest does not believe that either it or its customers should bear the cost of creating and deploying a customized message in its COs. *But for* AT&T's proposed discontinuance, a message would not be necessary. While AT&T states that it "is willing to pay reasonable charges to implement such an announcement,"[7] Qwest questions whether AT&T is willing to pay for the incremental capital costs necessary to provide an additional message in many incumbent LEC COs. If AT&T agrees to assume the entire cost burden of deploying customized messages, Qwest will provide a customized message in its COs, if the Commission finds it to be in the public interest. Thus, the question facing the Commission is -- is the additional expense worth the additional benefit of reducing customer confusion.

Qwest also wishes to comment on AT&T's Sep. 25, 2001 *Ex Parte* which appears to raise more questions than it answers. While this *Ex Parte* purports to show how much AT&T is paying incumbent LECs for special access with its current Feature Group C ("FGC") arrangements, Qwest cannot reconcile AT&T's data with Qwest's account records.[8] Qwest can only speculate that AT&T must be self-provisioning a significant number of DS1s.[9] AT&T should not attribute any such self-provisioning costs to incumbent LEC access charges. In summary, it is not at all clear from the *Ex Parte* how much AT&T is paying in access charges for its current FGC network arrangements or how much it will save by discontinuing coin sent-paid service.

Respectfully,

James T. Hannon by [signature]

James T. Hannon

cc: Christopher D. Libertelli - FCC
Jon Minkoff - FCC
Jeffrey Carlisle - FCC
Robert W. Quinn, Jr. - AT&T
Michael F. Del Casino - AT&T

---

[5] *Id.*

[6] *Id.* at n.15.

[7] AT&T Sep. 18 *Ex Parte* at 4.

[8] Moreover, Qwest is confused by the portion of AT&T's tables which reference "anticipated cost savings."

[9] Clearly, AT&T has the capability to avoid incurring incumbent LEC access charges by self-provisioning, as a result of its purchase of Teleport and its build-out of local facilities in many metropolitan areas. Furthermore, most of the DS1s in question cross LATA boundaries and are provisioned at least partially by AT&T itself.